



1.0 OCCURRENCE REPORTING PROGRAM ADMINISTRATION

1.1 Purpose

Implementing an effective occurrence reporting program requires successful coordination of many different activities and functions. Some of these items are discussed in the primary directive for occurrence reporting requirements, (DOE 232.1), while others have been discussed as "lessons learned" documents.

This section addresses the key functions and areas that have created the most questions. Program administrators are advised NOT to try and include each of these in their implementation procedures, since many of them are of primary concern to system administrators and not to operations personnel. However, the design and structure of a site's occurrence reporting program should take each of these areas into account.

1.2 Authority File

Because the Occurrence Reporting and Processing System (ORPS) is a computerized database, it must be protected to ensure that only authorized persons access the system or enter data into it. ORPS allows access to four levels of users: General Users, Facility Manager/Designee, Facility Representative/Designee, and Program Manager/Designee. For a description of these positions, refer to Appendix A, "Standard Terminology," of this document.

Potential ORPS users can become authorized by completing the forms that each site provides to the ORPS System Administrators. Also, each authorized user must have the level of his/her access defined. Every facility is required to have a Facility Manager (usually a contractor), a DOE Facility Representative, and a DOE Program Manager. These individuals, as well as their designees, must identify their assigned facility(s) on an ORPS registration form. This information is then transferred by the ORPS System Administrator to the applicable facility authority file. Once a user is registered, the system assigns a unique identification code and password to that person. The assigned user identification code cannot be changed; however, the user now has the option of using the assigned password or creating his/her own unique password. The site occurrence reporting administrator should be knowledgeable about the password restrictions and be able to instruct users in the steps necessary to create his/her own password. The occurrence reporting program at each site should include controls on the number of authorized users and provide an efficient way to communicate authority file information to the ORPS System Administrator.

The site occurrence reporting administrator has the necessary authority file forms. Additional forms are available by calling the ORPS System Administrator at (208) 526-8900 Ext. 2.



To reduce the chance of access by untrained or unauthorized personnel, each site should ensure that a single organization reviews and approves any requests for access to ORPS.

1.3 Hardware/Software

ORPS was initially developed by the DOE Office of Nuclear Energy (NE-1) and is installed on a minicomputer (a Hewlett Packard Reduced Instruction Set Computer [RISC¹]) at the Idaho National Engineering Laboratory (INEL).

ORPS allows users at any site to access the system via a terminal or a personal computer (PC²) equipped with the appropriate terminal emulation software (using a modem or a site local area network [LAN]).

Hardware Requirements

Memory and Processors

For the purpose of transmitting ORs, the PC must have:

- Enough memory available to download, store, and run the PC ORPS software program (i.e. 512K of random access memory [RAM] and 5MB of disk space), which is available on the HP 3000.
- A 286 or 386 DOS³ emulation board is required for Macintosh⁴ users.

Less powerful PCs can be used to access the ORPS (e.g., computers used by the DOE Facility Representatives, DOE-HQ Program Manager, and general users), but cannot be used to submit ORs (i.e., computers used by Facility Managers).

¹ Trademark of Hewlett Packard, Corp.

² Trademark of International Business Machines, Inc.

³ Trademark of Microsoft, Corp.

⁴ Trademark of Apple Computer



Communications Hardware

The PCs used to submit reports or access ORPS generally require a modem. The ORPS System Administrator recommends modems with the following specifications:

- Hayes⁵ Compatible
- V.32 protocol
- MNP Class 9 error correction and data compression
- 9600 baud

If your site requires ORPS access for many users, the site's network support group may be able to add a set of shared modems to the LAN. These can be used from any PC connected to the LAN and are a very cost-effective alternative to individual modems.

Software Requirements

The ORPS System Administrator recommends "Reflection" terminal emulator software.

- For IBM/IBM compatibles, use Reflection 7 version.
- For Macintosh computers, use Reflection 3 version.

NOTE: Facility Managers, DOE Facility Representatives, and DOE-HQ Program Managers must use Reflection because ORPS requires block mode emulation.

General users may use other communications software; however, such software may prove more difficult to use because some features will not be available.

To ensure accountability at your site, a single organization should have control of the software necessary to access ORPS.

1.4 Integration with Other DOE Requirements

When developing facility- and/or site-specific occurrence reporting procedures, special attention should be given to other DOE Orders; Secretary of Energy Notices (SEN); memorandums; and federal, state, and local reporting requirements. Each requirement that has been placed on the contractor by federal, state, or local governments should be addressed in the facility and/or site procedures. Examples include DOE O 151.1, *Comprehensive Emergency Management System*, emergency reporting requirements, the federal environmental reporting requirements, Occupational Safety and Health Administration (OSHA) reporting requirements, reporting of suspect parts, and any agreements with state and local authorities.

⁵ Trademark of Hayes Micro Computer, Inc.



1.5 Integration with Site Software

ORPS is a good source for collecting DOE-wide data, but may not include enough site-specific data. Some sites have developed the ability to download information directly from ORPS into a site-specific database so that additional data can be entered and tracked. Several software packages are available for this type of data retrieval. The site computer support organizations should be able to assist with the procurement and installation of the appropriate software.

1.6 Procedure Review

An occurrence reporting program is fully dependent on the adequacy of the implementing procedures. Procedures must be developed that are easy to use and understand, while at the same time ensuring that the requirements of DOE O 232.1 are satisfied.

The specific implementing procedures for a site and/or facility must be reviewed and approved by the cognizant DOE Field Office and the DOE Secretarial Officer.

As occurrence reporting procedures must address a wide range of activities and organizations, the procedures should be reviewed by as many internal organizations as possible.

1.7 Discovery Time

DOE O 232.1 requires that an event or condition be categorized as soon as possible, but within two hours of the event or condition identification. Several questions have been asked concerning the determination of discovery time. Facility/site-specific occurrence reporting procedures should address this and be very clear as to what constitutes discovery time. DOE O 232.1 describes discovery time as that time when the facility staff discover the event or condition being reported. Listed below are some examples designed to clarify this topic.

1. A radiation worker discovers contamination outside a controlled area at the beginning of his/her shift, but does not report it to line management until the end of his/her shift. Because of the relative significance of uncontrolled contamination, procedures should be in place that require notification to line management immediately upon discovery. In this case, the discovery time should be when the radiation worker found the contamination, not when that person decided to notify line management. The delays in reporting this particular event would result in exceeding the required two-hour categorization time limit.
2. A subcontractor notices a process air monitor not in operation at 8:00 a.m. This condition is reportable for the operational status of the system. The subcontractor brings it to the attention of the process operator at 10:00 a.m. The operator reports the condition to the Shift Manager at 10:15 a.m., who notifies the Facility Manager at 10:45 a.m. The discovery time of this event is 10:00 a.m., which is the time the cognizant staff discovered the reportable condition.



The process operator is responsible to notify the Shift Manager and initiate appropriate corrective actions under the direction of the Shift Manager. The Shift Manager is the Facility Manager Designee responsible for the facility operations and is therefore responsible for proper identification and categorization of the occurrence.

3. The same reasoning applies to an environmental release of hazardous or radioactive material. In each case, the site environmental protection personnel or radiological control technicians must analyze the material. Each technician is certified to perform the analysis and determine whether the analytical results meet procedural limits. The sample was drawn at 8:00 a.m. The technician completed and recorded the analysis at 1:00 p.m. and reported the results to the Shift Manager at 2:00 p.m. The discovery time is 1:00 p.m. The operator, a laboratory technician in this case, is responsible for prompt notification of out-of-limit conditions regardless of reportability requirements.
4. A surveillance on a piece of safety class equipment was required on a specific date. Six months later, it was determined that the surveillance was missed. The discovery date was when the determination was made that the surveillance was missed, not the date the surveillance was required.
5. During the course of a review of a safety analysis, someone questions a particular assumption. To determine if the concern is valid will take considerable review and computer analysis. The review and computer analysis are done and show that the concern is valid. The discovery time is when the analysis has been completed, not when it is questioned.

However, it should be noted that the concern should be properly transmitted to the Facility Manager, and if the Facility Manager considers that the concern may be valid, then the facility would be obligated to limit facility operations, which would be classified under criteria 1.C.ON(1). For this situation, the discovery time would be when the Facility Manager made the determination that the concern had a high potential to be real and that limiting facility operations was necessary.

Each facility and/or site should be very specific when defining discovery time in implementing procedures to avoid confusion and ensure consistency among those occurrences.

1.8 Safety Class and Safety Significant Structures, Systems, or Components

Each facility/site is required to define its Safety Class and Safety Significant Structures, Systems, or Components (SSCs) for occurrence reporting. This should be integrated with existing site equipment classification procedures. When complete, this needs to be included as a list or by reference in facility or site occurrence reporting procedures. The purpose of this is for ease of reference should a Safety Class equipment-related occurrence take place. See Appendix A for the definitions of Safety Class and Safety Significant SSCs.



1.9 Classified Information

Since the purpose of occurrence reporting is to document event condition information and make it easily accessible to a large number of people, Facility Managers must ensure that no classified information is divulged. Most problems can be eliminated by remembering the following two items:

1. Under no circumstances shall classified information be entered into ORPS.
2. The facility that generates the report is responsible for ensuring that the appropriate security classification reviews are performed before the report is entered into ORPS or made available to the public.

Unclassified Controlled Nuclear Information (UCNI) is allowed on ORPS, since it is sometimes vital to understanding the occurrence. The report must be marked as including UCNI and all UCNI must be removed before the report is distributed to public reading rooms. Classified information must never be transmitted into the ORPS system.

Classified Operations

If a site and/or facility conducts classified operations or generates classified information, every OR (Notification, Update, or Final) generated must be reviewed by an authorized classifier before transmission to ORPS. This review is necessary to ensure that the report does not contain any classified information. Furthermore, the authorized classifier's name and the date that the report was reviewed must be included in the OR.

NOTE: See Appendix A for the definitions of "authorized classifier" and "reviewing official."

UCNI Operations

If a facility conducts UCNI operations or generates UCNI, then the following applies:

1. Every OR generated in that facility must be reviewed by a reviewing official, and if UCNI exists, the report must be marked UCNI.
2. Every final OR sent to a public reading room must be reviewed, and modified if necessary, to ensure that the report does not contain UCNI.

Non-Classified, Non-UCNI Facilities

No special security classification review is required before a report is transmitted to the ORPS if the report is generated in a facility in which classified/UCNI operations are not conducted and classified/UCNI information is not generated.



Classified Reports

If an OR contains classified information, the information cannot be transmitted electronically to ORPS. The Facility Manager must complete the report in hard copy and send the hard copy report to the DOE Facility Representative and DOE-HQ Program Manager using normal procedures for handling classified documents (see DOE O 5632.1C, *Records Retention Classified Reports*).

Additionally, the Facility Manager must enter a "sanitized version" of the report into ORPS (after another review by an authorized classifier). The sanitized report provides generic, unclassified information for the ORPS system and generates a tracking number for the classified report. The Facility Manager must ensure that this number is put on the hard copy (i.e., classified) version of the report.

Recordkeeping

Facilities that conduct classified operations or generate classified information must review every OR and maintain a log that documents the following:

- OR number
- When (date and time) the report was submitted
- Name of the person who submitted the report
- Authorized classifier's name
- When (date and time) the report was reviewed
- Title of the authorized classifier

If the report is determined to contain classified information, the hard copy version of the report must contain the signature of the authorized classifier. If the report is determined to be unclassified, then it must be additionally reviewed for UCNI before it is transmitted into ORPS.

Reports Containing UCNI

If the reviewing official finds that a report does contain UCNI, then the Facility Manager must have Item 8 on the OR form marked "yes." This will automatically generate a warning on the report and in ORPS indicating possible UCNI and that appropriate safeguards must be taken when handling the report.

1.10 Categorization of Occurrences

Occurrences at any given facility and/or site often vary in degree of severity and significance. A major purpose of DOE O 232.1 is to consistently categorize occurrences so that DOE operations personnel and facility and/or site contractors understand the degree of significance associated with various occurrences. DOE O 232.1 provides more than 200 criteria arranged into two categories: Unusual Occurrence and Off-Normal. These criteria are not intended to be all-inclusive. They represent a minimum set of standards necessary to allow each facility and/or site to develop specific reporting criteria that is applicable to that facility and/or site. For an example of how the



DOE O 232.1 has been incorporated into a site reporting matrix, see Section 2.0, *Categorization Matrix of Reportable Occurrences*.

For emergency responses, DOE Order 151.1 provides specific requirements for initial notification and follow-up. Facility- or site-specific emergency response plans and procedures may include additional requirements. Events that have been declared an emergency occurrence require the completion of all occurrence reporting requirements.

1.11 DOE Oral Notification

For unusual occurrences, oral notification to the DOE Facility Representative and the DOE-HQ Program Manager is required. This is accomplished by first notifying the local DOE Facility Representative and then calling the DOE-HQ Emergency Operations Center (EOC). The EOC is tasked with connecting callers to the on-call DOE Program Manager and then recording and archiving conversations. If necessary, the DOE Program Manager will contact the Program Secretarial Officer or other HQ programs. For those sites that have a centralized communications center, it may be a good practice to have the call to HQ originate there. This will allow a mechanism for record-keeping through recorded lines.

For events that are classified as an Alert, Site Area, or General Area Emergency in accordance with DOE Order 151.1, the notification requirements to DOE-HQ remain the same. That is, the Facility Manager must call the DOE Facility Representative and DOE-HQ Program Manager (through the DOE-HQ EOC) within 15 minutes of the event being classified as an emergency. Notifications for occurrences involving classified operations cannot be made using the internal insecure lines. These calls must be made through a secure line. See the DOE 5600 series Orders for the requirements to transmit classified information.

It is important to note that the Program Manager or Designee may attempt to contact the Facility Manager/Designee at the telephone number provided in the Facility Manager/Designee Field of the OR. Therefore, the name, title, and telephone number should be accurate during and after normal business hours, particularly for the Notification Report. If the designee is a Shift Manager, then the title should clearly show the "Shift Manager" where the relieving Shift Manager could answer any questions made by the Program Manager. If the designee is not an on-shift point of contact, then an accurate telephone number should be provided to allow contact of that person during and after business hours.

1.12 Occurrence Report Preparation

The following is a list of the phases of an OR (following categorization) and the dates and times they are required to be performed. These dates should be clearly identified in facility- and/or site-specific procedures.



Notification Report

The Notification Report is due on ORPS by the end of the next business day (not to exceed 80 hours from the time of categorization). Even though ORPS may be located in a different time zone, this requirement is intended to mean the end of the next business day at the location (time zone) at which the occurrence took place. Site procedures must be very clear on what constitutes a "business day" (i.e., 0700-1600, 0630-1700, etc.) The 80-hour allowance is intended for occurrences discovered during weekends and holidays.

Update Report(s)

An Update Report should be submitted when any of the following situations arise:

- Any time after the Notification Report when significant new information is available,
- When the Final Report cannot be submitted within 45 days,
- When changing the occurrence categorization (e.g., off-normal changed to unusual occurrence), or
- When an occurrence is added to a roll-up report.

The status of the occurrence investigation should be included in any Update Reports. If the Final Report cannot be submitted within 45 days, the Update Report must include an estimate of when the Final Report will be completed. Multiple Update Reports may be submitted.

Final Report

A Final Report must be submitted within 45 calendar days from the date of the initial occurrence categorization. The Final Report is created and submitted when the cause of the occurrence has been analyzed; direct cause, contributing causes, and root cause determined; corrective actions determined and scheduled; and lessons learned identified. If a Final Report cannot be submitted within 45 days, the Facility Manager must submit an Update Report and include an explanation for the delay and an estimated date when the Final Report will be submitted. This information should be included in the "Evaluation by Facility Manager" block of the occurrence report, i.e., Field 24. This Update Report must be submitted within the 45 days. Corrective actions do not need to be complete to submit a Final Report, only identified and scheduled.

Rejected Reports

Final Reports that are rejected by either the DOE Facility Representative or the DOE-HQ Program Manager are returned to the Facility Manager. The Facility Manager must make adjustments to the report and resubmit the Final Report within 21 calendar days of the date of rejection. If the revised Final Report cannot be submitted within 21 days, the Facility Manager must submit an Update Report and include a justification for the delay and an estimated date when



the revised Final Report will be submitted. This information should be included in the "Evaluation by Facility Manager" block of the occurrence report, i.e., Field 24.



1.13 Radiological Events

When reporting radiological contamination occurrences, additional emphasis must be placed on providing complete information pertaining to the contamination. Information provided in Field 27, "Impact on Environment, Safety and Health" should be completed and/or reviewed by qualified radiological control technicians. The health consequence, i.e., severity or significance, of the contamination should also be described. When the information available on the occurrence is preliminary, the OR should include remarks such as "This occurrence is based on preliminary information available at the time of the report. This information will be updated when further evaluation has been completed." Section 9.3 of DOE Manual 232.1-1 contains additional information on the types of statements and information that should be included in ORs resulting from radiological contamination.

1.14 Notice of Violations

The Price-Anderson Amendments Act of 1988 (PAAA) subjects DOE contractors to potential civil and criminal penalties for violations of DOE rules, regulations, and compliance orders relating to nuclear safety requirements. The general framework through which DOE will implement the PAAA requirements is contained in 10 CFR 820, which indicates that DOE will: (1) seek to ensure compliance with its nuclear safety requirements, and (2) exercise the civil penalty authority provided it in the PAAA.

The Noncompliance Tracking System (NTS) is used to capture information on potential noncompliances. NTS provides a means for contractors to notify DOE of noncompliance with these nuclear safety rules and the actions planned or taken to correct these conditions. These noncompliances are evaluated and tracked until they are brought to a conclusion.

Some PAAA violations are also reported as occurrences. NTS is linked to ORPS to retrieve pertinent data, thus reducing the need for duplicate data entry. The system is maintained by the ORPS System Administrator and can be accessed from the initial Operational Event Information Systems Menu. Users of NTS must be registered through the ORPS System Administrator and have approved NTS access granted. ORPS users do not automatically have access to NTS information.

1.15 Roll-Up/Generic Reporting

Roll-up or generic reports are those Occurrence Reports that are written to address multiple events/conditions. They are permitted for occurrences categorized as Off-Normal. Roll-up reports are permitted by DOE Order 232.1 in an effort to reduce the time and costs associated with reporting events/conditions that are similar in nature. If an event/condition meets certain requirements, it can be reported in either a existing nonfinalized report or in an approved Final Report. This would eliminate the need to generate a new Occurrence Report for similar or repetitive events/conditions.



The requirements that must be met before events/conditions can be reported in an existing report are: 1) preliminary investigation determines that the subsequent occurrence has the same general root cause; 2) preliminary investigation determines that the subsequent occurrence has the same or similar direct and contributing cause(s); 3) the preliminary corrective actions for the initial occurrence are expected to correct the same root cause type of failure; 4) any new corrective actions identified for the subsequent occurrence are added to the existing report; 5) the DOE Program Manager and DOE Facility Representative agree to include the subsequent occurrences into a roll-up report; 6) the DOE Facility Representative agrees to the addition of each subsequent occurrence into the roll-up report; and 7) an Update Report is issued with the subsequent occurrence information within the normal time period for a Notification Report.

A roll-up report may remain open for no more than 90 days from categorization of the first occurrence nor contain more than 30 occurrences. Appendix C, *Report Writers Guide*, of this guidance document details specific Occurrence Report Field entries for roll-up reports.

For example, counterfeit bolts originating from a single source are discovered in a facility after their distribution for use. The facility generates an Occurrence Report and performs corrective action. With concurrence of the DOE line Program Management (DOE Facility Representative and DOE Program Manager), later discoveries of the counterfeit bolts may be documented in a roll-up report.

1.16 Report Reviews

A well-defined OR review and approval process is a must for smooth operation of the occurrence reporting program.

DOE Order 232.1 specifies minimum review requirements. It requires that the DOE Facility Representative, in consultation with the DOE-HQ Program Manager, provide the Facility Manager his or her assessment of the occurrence and any actions DOE has taken since the occurrence. Both the DOE Facility Representative and DOE-HQ Program Manager are required to review and approve Final Occurrence Reports. In some situations, the DOE Program Manager approval requirement for Final Off-Normal Occurrence Reports may be delegated to the DOE Facility Representative.

In addition, there are occasions when the Facility Manager designee prepares and submits the OR. However, as the Facility Manager is ultimately responsible for the OR, the corrective actions, lessons learned, and evaluation, etc., the Facility Manager should review and concur with the report. Additional reviews by senior site or facility management may also be required and should be specified in site-specific procedures if applicable.

Most events that result in an OR involve DOE or contractor oversight organizations to some degree (i.e., Health Physics, Environmental Protection, Safety, Engineering Organizations, etc.).



Experience suggests that the review and approval process should provide an opportunity to obtain the affected oversight organizations' concurrence of the analysis of the event, the evaluation, and the planned corrective actions before the report is submitted to DOE for approval.

1.17 Updating Corrective Action Status

Once a final OR has been entered onto ORPS, the Facility Manager must ensure that the status of the corrective actions is kept up-to-date (i.e., to reflect changes in the target completion date or add an actual completion date). Once the OR is submitted as a Final Report, the Facility Manager will not have access to the report (i.e., for updating corrective actions) until the report is approved or rejected by the DOE-HQ Program Manager. Therefore, each facility should have a system to review the open corrective actions for each unapproved Final Report and update the target or actual completion date as necessary. Since most sites track corrective actions at a local level, the occurrence administrator should ensure that the local tracking system for corrective actions and the ORPS tracking system for corrective actions are maintained consistently.

1.18 DOE Facility Representative/Designee Responsibilities

Some sites have implemented a comprehensive training program for their DOE Facility Representatives. This training program includes a section on occurrence reporting that teaches the DOE Facility Representative the requirements of DOE O 232.1 and his/her related responsibilities:

1. Availability: The DOE Facility Representative is required to be available at all times. This typically means establishing an on-call list or duty roster that makes the DOE Facility Representative available to facility management on a 24-hour basis.
2. Notifications: The DOE Facility Representative is responsible for notifying the appropriate head of the Field organization, if necessary.
3. Direction: The DOE Facility Representative is asked to interface with the assigned Facility Manager to provide direction and guidance. Guidance also may come from the DOE-HQ Program Manager, but this will typically come through the site DOE Facility Representative.
4. Written Comments: The DOE Facility Representative, in consultation with the DOE-HQ Program Manager, should provide the Facility Manager with an assessment of the occurrence, initial and proposed corrective actions, follow-up by the contractor, and any other actions DOE has taken since the occurrence. This is typically accomplished by providing written comments on the OR through ORPS.
5. Oversight: The DOE Facility Representative and DOE-HQ Program Manager monitor the Facility Manager's evaluation of the occurrence to ensure acceptability of root cause



- determinations, generic implications, and corrective actions implementation and closure. This is accomplished by interaction with the Facility Manager and/or his/her designee.
6. Approval/Disapproval: The DOE Facility Representative is responsible for the initial review and approval or disapproval of Final ORs. If approved, the report is forwarded to the DOE-HQ Program Manager for his/her approval or disapproval. If either the DOE Facility Representative or DOE-HQ Program Manager disapproves (rejects) the report, it is returned to the Facility Manager. A written explanation for the disapproval should be included within the rejected report.
 7. Distribution: For unclassified reports, the distribution to the DOE Facility Representative and DOE-HQ Program Manager is accomplished through ORPS.

1.19 Occurrence Report Distribution

For all ORs that are determined to be unclassified, entering the information into the ORPS will satisfy DOE distribution requirements. All unclassified Final Reports, with the exception of final canceled reports, must be placed in the local reading room within two weeks of report approval, with an additional copy sent to the DOE Headquarters reading room. Once this distribution is made, the Freedom of Information Act mandates are met.

For those ORs that are determined to contain classified or UNCI information, adherence to DOE and site procedures that define protection and control of classified material is essential. An unclassified version of the Final Report shall be entered into ORPS, and shall be placed in the local reading room within four weeks of report approval, with an additional copy sent to the DOE Headquarters reading room.

Site and/or facility procedures should identify those organizations and/or individuals that should receive copies of ORs. These individuals/organizations may have responsibility for trending, lessons learned, accountability, or records retention.

1.20 Records Retention

ORs are retained in accordance with DOE O 1324.5B, *Records Management Program*. Facility and/or site procedures should identify the individual and/or organization that has records retention responsibility and should include the length of retention, disposition, and type of record storage (i.e., microfiche, microfilm, or hard disks).

Types of records that are typically maintained for occurrences include:

- Photos
- Critique Records
- Interview Records
- Root Cause Worksheets



- Associated Investigation Reports
- Fact Sheets
- Equipment Monitoring Information

Additionally, information associated with completion and close-out of corrective actions should be maintained.

1.21 Unresolved Issues

For actions or determinations on which the Facility Manager and the DOE Facility Representative cannot agree, the issue must be elevated through contractor management. The DOE Facility Representative also will elevate the issue to the responsible DOE-HQ Program Manager, Secretarial Officer, or if necessary, to the Secretary. However, every effort should be made by the facility management to resolve issues at the facility level.

1.22 Exemptions

Not all facilities and/or sites will be able to meet every requirement of DOE Order 232.1. Where certain requirements cannot be met, a waiver or exemption must be requested from DOE-HQ. A temporary exemption to the reporting requirements may be granted, up to one year, by the Secretarial Officer responsible for the program at a specific facility and/or site. A permanent exemption can only be granted by the Secretary of Energy after obtaining concurrence from the Office of Environment, Safety and Health. A waiver or exemption request should be processed through the contractor line management and the DOE Operations or Field Office before being submitted to the responsible Secretarial Officer. Prior to approval of a temporary exemption, the Office of Environment, Safety and Health should be notified.